

STATEMENT OF BASIS (AI No. 13756)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0103071 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Industrial Electric Motor Service, Inc
8920 Buzbee Drive
Baton Rouge, LA 70809

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Molly McKean

DATE PREPARED: February 6, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permits - LPDES permit effective date: August 1, 1998
LPDES permit expiration date: July 31, 2003

D. Date Application Received: January 2, 2008

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - electric motor repair and rebuilding**

This facility repairs and/or rebuilds electric motors. There are currently two discharges: (1) treated sanitary wastewater and (2) dynamometer cooling water. A dynamometer is a machine used to measure torque and rotational speed (rpm) to measure the power produced by an engine, motor, etc. The dynamometer must absorb the power developed which is then generally dissipated to the ambient air or transferred to cooling water. The application defines this water as non-contact, cooling type wastewater. The dynamometer operates (water is discharged) only 1-2 times per year.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 7694

C. LOCATION - 8920 Buzbee Drive, Baton Rouge, LA 70809, East Baton Rouge Parish
Latitude 30 22' 09", Longitude 91 01' 44"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
 Treatment: extended aeration, activated sludge STP
 Location: at the point of discharge from the sewage treatment plant, prior to mixing with
 any other waters
 Flow: 3000 GPD
 Discharge Route: into Ward's Creek via local drainage, thence into Bayou Manchac

Outfall 003*

Discharge Type: dynamometer cooling water
 Treatment: none
 Location: at the point of discharge from the dynamometer cooling reservoir, prior to
 mixing with any other waters
 Flow: intermittent
 Discharge Route: into Ward's Creek via local drainage, thence into Bayou Manchac

* Outfall 002 was deleted in a previous permit action.

4. RECEIVING WATERS

STREAM - Ward's Creek via local drainage, thence into Bayou Manchac

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040201

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 040201, Bayou Manchac - Headwaters to the Amite River, is listed on LDEQ's Final 2006 303(d) List as impaired for Ammonia (Total Ammonia), Phosphorus, Nitrogen (Nitrate + Nitrite as N), Organic Enrichment/Low DO, Pathogen Indicators, Chlorides, Sulfates, and TDS. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the electric motor repair and rebuilding point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Outfall 001 has the potential to discharge pollutants associated with the phosphorus, organic enrichment/low DO, pathogen indicators, nitrogen, ammonia, chlorides, TDS, and sulfates impairments. Outfall 002 has the potential to discharge pollutants associated with the organic

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enrichment/low DO impairment. LDEQ's position on nutrients, as supported by the ruling in *Sierra Club v. Givens*, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998), is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. LAC 33:IX.2707.D.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients, where the WQMP does not otherwise require specific nutrient limitations, is achieved by limiting the discharge of oxygen-demanding substances through a BOD₅ limitation. Compliance with the BOD₅ limitation as the indicator parameter will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Discharges in compliance with the standard sanitary limits applied in this permit should not cause or further contribute to the phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, or ammonia impairments. Discharges in compliance with the TOC limit at Outfall 002 should not cause or further contribute to the dissolved oxygen impairment. Chlorides, sulfates, and TDS impairments have been attributed to land clearance (land development/redevelopment). Limitations for these parameters shall not be included at this time.

A TMDL study is scheduled to be completed by March 31, 2011 by the state, or no later than March 31, 2012 by the EPA.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

A temperature monitoring requirement has been added at Outfall 003 and monitoring frequency decreased to 1/month for flow and TOC.

7. COMPLIANCE HISTORY/COMMENTS

A. WQMD – There is one incident report on file in the previous two years. A complaint was received on 8/4/06 stating that the facility was steam cleaning and sandblasting motors behind the facility. At the time of the investigation, there was evidence of sandblasting activity. The complaint file indicates that everything else was in order, but does not address the facility operating without a current LPDES permit.

B. DMR Review/Excursions – There are no DMRs on file for the previous two years.

8. EXISTING EFFLUENT LIMITS

Outfall 001 – treated sanitary wastewater

Parameter	Monthly Avg (mg/l)	Weekly Avg (mg/l)	Monitoring Frequency
Flow	Report	Report	semiannually
BOD ₅	---	45	semiannually
TSS	---	45	semiannually
Fecal Coliform Colonies/100 ml	---	400	semiannually
pH (su)	6.0 min	9.0 max	semiannually

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Outfall 003 – dynamometer cooling water

Parameter	Monthly Avg (mg/l)	Daily Max (m/l)	Monitoring Frequency
Flow	Report	Report	2/month
Net TOC	---	5	2/month
pH (su)	6.0 Min	9.0 Max	1/month

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040201 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Industrial Electric Motor Service, Inc

1. Outfall 001 - treated sanitary wastewater (estimated flow is 3000 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg : Weekly Avg (mg/l)	<u>Reference</u>
Flow	--- : Report	LAG530000; previous permit
BOD ₅	--- : 45	LAG530000; previous permit
TSS	--- : 45	LAG530000; previous permit
Fecal Coliform Colonies/100 ml	--- : 400	LAG530000; previous permit
pH	6.0 su – 9.0 su (min) (max)	LAG530000; previous permit

Treatment: Sewage treatment plant with aeration and activated sludge

Monitoring Frequency: semiannually BPJ per previous permit and Schedule B of LAG530000

Limits Justification: These limitations are based on the previous permit and the Class I Sanitary General Permit (LAG530000).

2. Outfall 002 - dynamometer cooling water (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	--- : Report	*, BPJ, LAG480000
TOC (net)	--- : 5	*, BPJ, LAG480000
Temperature	--- : Report	*, BPJ, LAG480000
pH (su)	6.0 – 9.0 (min) (max)	*, BPJ, LAG480000

*The use of any additives or corrosion inhibitors containing any of the 126 priority pollutants is prohibited.

Treatment: none

Monitoring Frequency: monthly – when discharging.

Limits Justification:

These limits are based on the previous permit, BPJ, and LAG480000, Schedule E.

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Net TOC = Effluent – Influent. The TOC of the discharge shall not exceed the intake TOC by more than 5.0 mg/l. Simultaneous sampling of the intake influent and effluent is required to establish a net value. The influent, effluent, and net value shall be reported on the DMR.

Temperature at the edge of the mixing zone shall not exceed 32.2 C (90 ° F).

EPA Guidelines for Metal Products and Machinery (40 CFR Part 438) are not applicable. 40 CFR 438.1(e)(1) states that non-process wastewater discharges are not subject to this part. 40 CFR 438.2(e) further defines non-process wastewater as sanitary wastewater, non-contact cooling water, etc.

*	previous permit
BPJ	Best Professional Judgement
su	Standard Units

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 7694 are not considered to be associated with industrial activities. Therefore, and SWP3 is not included in the permit.